

1

2

3

4

5

6

7

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR 06-0169 MMC

11) Plaintiff,)

12 v.)

13 ALAN BRUCE MEGLEN,)

a/k/a Jack Meglen,)

14) Defendant.)

15 _____)

STIPULATION AND [PROPOSED]
ORDER EXEMPTING SPECIFIED
DOCUMENTS FROM PROTECTIVE
ORDER

16 At the outset of this case the parties stipulated to a protective order regarding discovery, and the
17 Court entered that order.

18 The parties now represent that included within the original protective order are non-sensitive
19 materials that relate to the routine investigation of this matter.

20 AFPD Kalar requests that these materials be exempted from the protective order, and that he be
21 allowed to provide copies of certain materials (specified below) to his client to review outside the
22 presence of his attorney and to otherwise disseminate those materials as appropriate to the
23 investigation of this matter. AUSA Rees has no objection to this request.

24 Therefore, for good cause shown, the original stipulated protective order is hereby modified.
25 AFPD Kalar may copy, provide to his client, and otherwise appropriately disseminate discovery
26 provided by the government from Bates ABM0001-ABM0048, Bates ABM0067-ABM0081, and

1 Bates ABM0200-ABM0250. The remaining discovery and digital media provided by the
2 government to AFPD Kalar remains under the original protective order.
3
4

5 August 11, 2006

6 Dated



HON. MAXINE M. CHESNEY
United States District Court Judge

7 IT IS SO STIPULATED.
8
9

10 DATED

/s
11 KEVIN V. RYAN
United States Attorney
Northern District of California
12 ROBERT REES
Assistant United States Attorney
13
14

DATED

/s
15 BARRY J. PORTMAN
Federal Public Defender
Northern District of California
16 STEVEN G. KALAR
Assistant Federal Public Defender
17
18
19
20
21
22
23
24
25
26